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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 LAURA LEIGH *et al.*,
9 Plaintiffs,
10 v.

11 TRACY STONE-MANNING *et al.*,
12 Federal Defendants.

Case No. 3:23-cv-00568-ART-CSD

**DECLARATION OF PERRY B.
WICKHAM**

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14 I, Perry B. Wickham, declare as follows:

15 1. I am the Field Manager in the Bureau of Land Management's Tonopah Field Office in
16 Nevada. I have held this position since June of 2019.

17 2. My responsibilities as Field Manager include overseeing the compilation of the pertinent
18 documents for the Administrative Record for the claims raised by Plaintiffs in *Leigh et al.*, *v.*
19 *Stone-Manning et al.*, 3:23-cv-00568, Dkt. 1 ("*Stone Cabin Complaint*"), which I understand
20 challenges the April 11, 2023, Stone Cabin Complex Wild Horse Gather Plan Decision.

21 3. I am generally familiar with the documents that are part of the record for BLM's April
22 11, 2023, Stone Cabin Complex Wild Horse Gather Plan Decision. I am also familiar with the
23 process by which the documents considered directly or indirectly by BLM as part of its decision-
24 making process for the challenged decision were collected and compiled into the Administrative
25 Record.

26 4. To the best of my knowledge and based on my involvement in developing the
27 Administrative Record, I hereby certify that the Administrative Record is a true, correct and
28 complete copy of the documents that directly or indirectly considered by BLM for the April 11,

1 2023, Stone Cabin Complex Wild Horse Gather Plan Decision as pertinent to the claims raised in
2 the *Stone Cabin* Complaint.

3 5. The version of the Administrative Record being lodged along with this Declaration has
4 been supplemented pursuant to agreement with Plaintiffs to include twelve additional documents
5 (document numbers 238 through 249 in the index) directly or indirectly considered by BLM for
6 the April 11, 2023, Stone Cabin Complex Wild Horse Gather Plan Decision.

7 Pursuant to the provisions of 28 U.S.C. § 1746, I declare under penalty of perjury that the
8 foregoing is true and correct.

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10 _____
11 Perry B. Wickham, Field Manager
12 Tonopah Field Office
13 Battle Mountain District, BLM
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